

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
MIDLAND/ODESSA DIVISION**

VIRTAMOVE, CORP,

Plaintiff,

v.

AMAZON.COM, INC.,
AMAZON.COM SERVICES LLC, and
AMAZON WEB SERVICES, INC.,

Defendants.

Case No. 7:24-cv-00030-ADA-DTG

**REPLY DECLARATION OF JEREMY A. ANAPOL
IN SUPPORT OF DEFENDANTS' MOTION TO DISMISS OR TRANSFER**

I, Jeremy A. Anapol, declare and state as follows:

1. I am a partner in the law firm of Knobbe, Martens, Olson & Bear, LLP. I am counsel for Defendants Amazon.com, Inc., Amazon.com Services LLC, and Amazon Web Services, Inc. (collectively, “Amazon”) in this action and I appear *pro hac vice*. Some exhibits listed below are highlighted to make cited information easier to find.

2. Attached hereto as Exhibit 1 is a true and correct copy of excerpts from the transcript of the August 27, 2024, deposition of Susan Cameron.

3. Attached hereto as Exhibit 2 is a true and correct copy of excerpts from the transcript of the September 13, 2024, deposition of Raviprasad Mummidu.

4. Attached hereto as Exhibit 3 is a true and correct copy of excerpts from the transcript of the September 5, 2024, deposition of Mats Lannér.

5. Attached hereto as Exhibit 4 is a true and correct copy of Plaintiff’s Infringement Contentions.

6. Attached hereto as Exhibit 5 is a true and correct copy of a discovery dispute submission from the parties in this case to the Court.

7. Attached hereto as Exhibit 6 is a true and correct copy of excerpts from the transcript of the October 7, 2024, deposition of Paul O’Leary.

8. Attached hereto as Exhibit 7 is a true and correct copy of correspondence between Plaintiff’s counsel and counsel for Amazon.

9. Attached hereto as Exhibit 8 is a true and correct copy of excerpts from the transcript of the October 18, 2024, deposition of Gregory O’Connor.

10. Attached hereto as Exhibit 9 is a true and correct copy of an email I received from Plaintiff’s counsel.

11. Google LLC moved to transfer venue to the Northern District of California in *VirtaMove Corp. v. Google LLC*, Case No. 7:24-cv-00033, Dkt. No. 48 (W.D. Tex., Jul. 17, 2024).

12. Hewlett Packard Enterprise moved to transfer venue in *VirtaMove v. Hewlett Packard*, Case No. 2:24-cv-00093, Dkt. No. 87 (E.D. Tex. Oct. 14, 2024).

13. International Business Machines moved to transfer venue to the Northern District of California in *VirtaMove, Corp. v. Hewlett Packard Enter. Co.*, Case No. 2:24-cv-00093 at Dkt. No. 78 (E.D. Tex., Aug. 21, 2024) (motion to transfer); *VirtaMove v. Int’l Business Machines Corp.*, Case No. 2:24-cv-00064, Dkt. No. 22 (E.D. Tex. Apr. 17, 2024) (consolidating cases and assigning *VirtaMove v. Hewlett Packard* as lead case).

14. Amazon does not expect Hani Suleiman, Arturo Molina, Beau Gosse, or Haoqi Wang to attend trial. Suleiman’s knowledge relates to Prime Video, which VirtaMove has not included in its infringement contentions. Molina no longer works at Amazon. Gosse and Wang were identified as part of a team responsible for EMP, but are less knowledgeable about EMP than Raviprasad Mummidi.

15. Amazon does not expect Adi Habusha, Yair Armoza, Udi Ashkenazi, or Yotam Admon to attend trial at least because they are (1) based in Israel and (2) not expected to have any knowledge material to the disputed issues in this case because they work on products not accused of infringement here.

16. Amazon does not expect engineers Alekhya Kumbam or Amul Cherukuri to attend trial because they lack knowledge material to the disputed issues in this case. The projects they worked on are described in the declaration of Mats Lannér submitted herewith. Lannér has more comprehensive knowledge of ECS because he is Director of Software Development for ECS and has worked at Amazon longer.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 25th day of October, 2024 at Wilmington, Delaware.

/s/ Jeremy A. Anapol

October 25, 2024

Respectfully submitted,

Of Counsel:

By: /s/ Jeremy A. Anapol

Harper Estes
Texas Bar No. 00000083
hestes@lcalawfirm.com
LYNCH, CHAPPELL & ALSUP
A Professional Corporation
Suite 700
300 N. Marienfeld,
Midland, Texas 79701
Telephone: 432-683-3351
Telecopier: 432-683-2587

Joseph R. Re (*Pro Hac Vice*)
Jeremy A. Anapol (*Pro Hac Vice*)
KNOBBE MARTENS OLSON & BEAR LLP
2040 Main Street, 14th Floor
Irvine, CA 92614
Telephone: 949-760-0404
Facsimile: 949-760-9502
joe.re@knobbe.com
jeremy.anapol@knobbe.com

Colin B. Heidman (*Pro Hac Vice*)
Christie R.W. Matthaei (*Pro Hac Vice*)
Logan P. Young (*Pro Hac Vice*)
KNOBBE MARTENS OLSON & BEAR LLP
925 4th Ave, Ste 2500
Seattle, WA 98104
Telephone: 206-405-2000
Facsimile: 206-405-2001
colin.heidman@knobbe.com
christie.matthaei@knobbe.com
logan.young@knobbe.com

Counsel for Defendants
Amazon.com, Inc.,
Amazon.com Services, LLC
and Amazon Web Services, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on October 25, 2024, all counsel of record who are deemed to have consented to electronic service were served with a copy of the foregoing via the Court's CM/ECF System.

/s/ Jeremy A. Anapol
Jeremy A. Anapol